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WILLIAM J. MURPHY
1926-2006

April 29, 2025

Hon. Mitchell J. Katz
U.S. Magistrate Judge
Federal Building and U.S. Courthouse
P.O. Box 7367
Syracuse, New York 13261

LETTER REQUEST

Re: Justin Jones, as Administrator of the Estate of Jason Jones, Deceased
v. The Village of Catskill, et al.
Case No.: 1:23-cv-87 (MAD/MJK)

Dear Judge Katz:

Our firm represents all defendants in the above-entitled action and we make this letter request for a brief and targeted extension of the May 1st discovery deadline set by Your Honor via Text Scheduling Order on October 17, 2024 (Dkt. 41) and restated in Text Order dated January 25, 2025 (Dkt. 44). As of this writing, all paper discovery has been completed. Depositions of all three defendant officers and the former Chief of Police have been completed. In addition, the depositions of the current Chief (then Lieutenant) as well as both dispatchers employed by the Village have been completed. Finally, defendants voluntarily produced the former Village Clerk and she was also recently deposed. Defendants previously agreed to produce a former Lieutenant employed by the Police Department at the time of the underlying incident, but that deposition was postponed due to his vacation travel. The only remaining deposition for defendants to conduct is that of the Estate Representative, Justin Jones.

On April 17, I emailed plaintiff's counsel to finalize the scheduling of the former Lieutenant and the Estate representative and to further identify any additional witnesses plaintiff wished to schedule for a deposition. Receiving no response, I sent a follow up e-mail on April 24 inquiring as to same noting the May 5 deadline. In response, plaintiff's counsel advised that plaintiff intended to request an extension of the discovery deadline. To date, we have not been contacted by counsel to discuss the same.

Based on the foregoing, defendants respectfully request a specific and targeted extension of the May 1, 2025 discovery deadline until May 20, 2025 to permit the depositions of former Lieutenant Ronald Frascello and Estate Representative, Justin Jones, to be completed.

Thank you for your kind attention to this request.

Respectfully submitted,

MURPHY BURNS GROUDINE LLP



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TKM/dk

c: All attorneys of record via ECF